

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION)
)
 This document relates to:)
)
The County of Summit, Ohio, et al. v. Purdue)
)
 Pharma L.P., et al.)
)
 Case No. 18-op-45090)
)
 and)
)
The County of Cuyahoga v. Purdue Pharma)
)
 L.P., et al.)
)
 Case No. 1:18-op-45004)
)
)

**NOTICE OF SERVICE OF DEFENDANTS' REPLY IN SUPPORT OF THEIR MOTION
TO EXCLUDE EXPERT TESTIMONY OF KATHERINE KEYES, ANNA LEMBKE &
JONATHAN GRUBER RE THE "GATEWAY HYPOTHESIS" OF CAUSATION**

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719, certain Defendants¹ hereby provide notice that on August 16, 2019, they served unredacted copies of the following documents on all Parties, the Court, and the Special Masters:

- Defendants' Reply in Support of Their Motion to Exclude Expert Testimony of Katherine Keyes, Anna Lembke & Jonathan Gruber Re The "Gateway Hypothesis" of Causation;

¹ Teva Pharmaceutical Industries Ltd., Allergan plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and an Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion and, thus, they do not waive and expressly preserve their pending personal jurisdiction challenges.

- Declaration of Emily S. Ullman in Support of Defendants' Reply and accompanying Exhibit 1; and
- Summary Sheet for Defendants' Reply in Support of Their Motion to Exclude Expert Testimony of Katherine Keyes, Anna Lembke & Jonathan Gruber Re The "Gateway Hypothesis" of Causation (also attached hereto as Exhibit A).

Dated: August 16, 2019

Respectfully submitted,

BY: /s/ Mark S. Cheffo
Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Telephone: (212) 698-3500
Mark.Cheffo@dechert.com

*Counsel for Defendants Purdue Pharma L.P.,
Purdue Pharma Inc., and The Purdue
Frederick Company*

*Co-Liaison Counsel for the Manufacturer
Defendants*

/s/ Carole S. Rendon
Carole S. Rendon
BAKER & HOSTETLER LLP
Key Tower 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 621-0200
Fax: (216) 696-0740
crendon@bakerlaw.com

*Counsel for Defendants Endo Health Solutions
Inc. and Endo Pharmaceuticals Inc.; Par
Pharmaceutical, Inc., and Par Pharmaceutical
Companies, Inc.*

*Co-Liaison Counsel for the Manufacturer
Defendants*

/s/ Enu Mainigi

Enu Mainigi
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Fax: (202) 434-5029
emainigi@wc.com

Counsel for Defendant Cardinal Health, Inc.

*Co-Liaison Counsel for the Distributor
Defendants*

/s/ Shannon E. McClure

Shannon E. McClure
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
Fax: (215) 851-1420
smcclure@reedsmith.com

*Counsel for Distributor Defendant
AmerisourceBergen Drug Corporation*

*Co-Liaison Counsel for the Distributor
Defendants*

/s/ Geoffrey Hobart

Geoffrey Hobart
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662-5281
ghobart@cov.com

*Counsel for Distributor Defendant
McKesson Corporation*

*Co-Liaison Counsel for the Distributor
Defendants*

/s/ *Kaspar Stoffelmayr*

Kaspar Stoffelmayr
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
Telephone: (312) 494-4434
Fax: (312) 494-4440
kaspar.stoffelmayr@bartlitbeck.com

Counsel for the Walgreens Defendants

*Liaison Counsel for the Chain Pharmacy
Defendants*

CERTIFICATE OF SERVICE

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ *Geoffrey E. Hobart*
GEOFFREY E. HOBART